

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

CC Docket No.: 01-277

In re:)	
Application of BellSouth Corporation)	AFFIDAVIT OF MARY
Pursuant to Section 271 of the Telecommunications)	CAMPBELL ON BEHALF OF
Act of 1996 to Provide In-Region, InterLATA)	NUVOX COMMUNICATIONS
Services in Georgia and Louisiana)	

Mary Haynsworth Campbell, being first duly sworn, deposes and says:

Access to Unbundled Network Elements (Checklist Item 2)

1. I am Tariff Manager for NuVox Communications, Inc. ("NuVox"). My business address is 301 North Main Street, Suite 5000, Greenville, South Carolina 29601.

2. I have a B.S. degree in Urban Administration and City Planning from the College of Charleston. I have been employed in the telecommunications industry for seven years. I have held various regulatory positions with LCI, CTG, Qwest Communications and NuVox.

3. My affidavit outlines NuVox's concerns about the integrity of the data that underlie BellSouth's performance reporting. My affidavit describes fatal flaws in BellSouth's performance data for NuVox which make the data unreliable. First, until July 9, 2001, and despite BellSouth assurances to the contrary, the data posted on BellSouth's Performance Measurement Analysis Platform ("PMAP") website did not include data for all of NuVox's operations. Prior to July 9, 2001, the PMAP data was incomplete and inaccurately reflected BellSouth's performance. Second, even after BellSouth posted what purported to be complete NuVox data, the BellSouth raw data files from which the reports were generated do not include all of NuVox's transactions. BellSouth's reported data is inaccurate and unreliable.

A. BellSouth's PMAP Data Did Not Include All of NuVox's Operations.

4. My responsibilities at NuVox include handling special projects for company management. In late-May 2001, I was asked to review data posted on BellSouth's PMAP regarding BellSouth's performance.

5. On May 25, 2001, I contacted NuVox's BellSouth account representative, Scott Christian, to obtain the required user identification and password to access NuVox's data on the PMAP website. I told him the data could be under any of several company names – NuVox, TriVergent, State Communications or Gabriel Communications. (State Communications is the name of NuVox's original predecessor corporation. State Communications later became TriVergent Communications which recently merged with Gabriel Communications.) BellSouth provided me a single user identification and password to access all of NuVox's data.

6. On May 31, 2001, I logged on to the website and saw that the reports listed the company name as STATECOMM with the operating company number ("OCN") 8672.

7. OCNs are assigned by National Exchange Company Association and are required by BellSouth to process orders for resold services and for unbundled network elements ("UNEs") used in combination with NuVox's own facilities to provide telecommunications services.

8. NuVox has several OCNs. Among them are OCN 8672 (assigned for resale orders) and OCN 2505 (assigned for ordering UNEs and related services for customers served on NuVox's facilities). These are the two OCNs NuVox uses for ordering from BellSouth.

9. When I saw that the PMAP website listed only the name STATECOMM and the 8672 OCN, I was concerned that the PMAP data was not complete.

10. On or about June 5, 2001, I spoke with Jan Strain, a BellSouth PMAP Administrator, and told her of my concern. She assured me that she had checked all the names

Mr. Christian had given her for NuVox. She told me that our company's data was listed under the name STATECOMM and that there was no additional data under any of the other company names.

11. After my discussion with Ms. Strain, I reviewed the PMAP data for April and May 2001 and determined that there were large discrepancies between NuVox internal data and the BellSouth PMAP data. For instance, the NuVox internal data reflect that NuVox submitted 616 local service requests ("LSRs") to BellSouth throughout the region during April 2001. By comparison, BellSouth's count of NuVox LSRs as shown on several PMAP reports was 1942 for April.

12. To validate BellSouth's data, I compared purchase order numbers ("PONs") from NuVox's records with BellSouth's raw data files for metric O-7 "% Rejected Service Requests" for April 2001. None of the PONs from the NuVox internal report was included on the BellSouth raw data file.

13. In a further effort to validate BellSouth's data, I attempted to compare BellSouth's service order flow-through data with NuVox internal data. BellSouth publishes order flow-through data for all CLECs, but substitutes the CLEC's name with a key number to protect the confidentiality of individual CLECs' data. Therefore, it was necessary for me to obtain the key number assigned by BellSouth to NuVox flow-through data.

14. On June 19, 2001, I requested the flow-through report key for our company from Jan Strain. She forwarded my request to Debbie Gardner of BellSouth. On June 20, 2001, Ms. Gardner forwarded me the key for April data which she identified as TriVergent (OCN 2505). In her e-mail, Ms. Strain stated that TriVergent data "is shown in PMAP as State Comm." However, all of the data on the PMAP website is identified as STATECOMM OCN 8672.

15. When I reviewed the BellSouth flow-through data for NuVox for April under the key number, I discovered that the information was still incomplete and reflected only a fraction of the orders submitted to BellSouth by NuVox for this period. None of the orders for UNEs and related services submitted under OCN 2505 was included.

16. On July 5, 2001, I telephoned Scott Christian and informed him of this discrepancy by voice mail. He returned my call the same day and told me that there should be data under OCN 2505 (UNEs) as well as OCN 8672 (resale). However, he told me that BellSouth did not find any PMAP reports with NuVox's OCN for unbundled network elements, *i.e.*, 2505.

17. Mr. Christian's statement contradicted what Ms. Strain told me in early June when I first expressed my concern at seeing only the STATECOMM company name on the PMAP website.

18. On July 7, 2001, Scott Christian informed me that the PMAP website would be corrected within the week to include data for all of NuVox's operations.

19. It is apparent now that the PMAP reports, which BellSouth purported to include all of NuVox data, in fact, did not. Until at least July 9, 2001, the PMAP reports included only data on NuVox's resale business. Since January 2001, resale has represented only approximately one third of NuVox's orders to BellSouth.

B. BellSouth's "New" NuVox PMAP Data is Inaccurate and Internally Inconsistent.

20. The PMAP data BellSouth has used for NuVox's operations since May 2001 is still missing significant amounts of information on NuVox transactions with BellSouth.

21. NuVox uses the Electronic Data Interchange ("EDI") interface and BellSouth's Local Exchange Navigation System ("LENS") to submit LSRs to BellSouth. NuVox's

electronic systems automatically capture records of LSRs submitted to BellSouth via EDI and responses received electronically from BellSouth, such as notices of fatal rejects.

22. For the month of August 2001, BellSouth failed to include 223 local number portability ("LNP") purchase order numbers ("PONs") in BellSouth's August PMAP reports.

23. The total number of LNP LSRs actually submitted by NuVox was at least 977. However, in BellSouth's raw data files "Ordering: LNP FOC Timeliness and Ordering", and "Rejected Interval and Percent Reject by Interval LNP" did not include 223 PONs submitted by NuVox via EDI in August.

24. I undertook the same type of comparison for NuVox's August data on fatal rejects. Fatal rejects are LSRs that cannot be processed by BellSouth because of CLEC errors. Again, I looked at two separate BellSouth raw data files. Both BellSouth reports understated the NuVox numbers. Again, the two BellSouth files reported inconsistent numbers.

25. NuVox's electronically generated data shows that there were 17 LNP EDI fatal rejects in August 2001 that were not included in the above raw data and therefore not reported in BellSouth's Miscellaneous Aggregate % LNP Flow-Through Service Request (Aggregate Detail) data report. This report includes 85 fatal rejects but the raw data and the report it is based on are missing 17 PONs that were rejected in August. The number for fatal rejects is at least 102.

26. BellSouth's PMAP data for NuVox is incomplete and inaccurate. BellSouth's PMAP inaccurately reflects BellSouth's performance with respect to NuVox in Georgia. The PMAP data for other CLECs may likewise be incomplete.

27. The facts described here suggest that the data in BellSouth's Georgia State Summary for CLEC aggregate data is incomplete, inaccurate and therefore unreliable.

I hereby swear that the foregoing is true and correct to the best of my information and belief.

Mary Haynsworth Campbell
Mary Haynsworth Campbell

Subscribed and sworn to before me
this 17 day of October, 2001.

Lee Haynsworth
Notary Public

My commission expires: My Commission Expires January 19, 2009

